

**REMARKS**

Claims 1-28 stand rejected under 35 U.S.C. §103 as being unpatentable over US Patent No. 5,815,717 (Stack). Claims 1 and 15 stand rejected under 35 U.S.C. §112, first paragraph as lacking an enabling disclosure. Reconsideration of the rejections is hereby solicited in view of the foregoing amendments and the following remarks.

Applicant's attorney is appreciative of the courtesy exhibited by the Examiner for granting at his discretion a telephone interview. Applicant's attorney is further appreciative of helpful and constructive suggestions provided by the Examiner during that interview. These suggestions have been taken into account for drafting this response. Applicant's attorney trusts this should be helpful for resolving the issues pending in the present application and bringing this prosecution to a favorable and early conclusion.

Claim 1 is directed to a computerized method for developing an electronics records management system without requiring knowledge regarding a computer programming language. Basis for this recitation may be found at page 6, lines 3-8; and at page 7, lines 4-12 of applicant's specification. The electronics records management system is customizable to meet the ongoing information needs of users of a given enterprise application. Claim 1, as amended, sets forth that the processing of the control tables to construct a respective record set object array corresponding to the rules provided by a user having business subject matter expertise in the enterprise application (but not required to have knowledge regarding a computer programming language) to produce a customized records management system is performed without having to create a program code based on a computer programming language. The record set object array for customizing the records management system is dynamically constructed without having to perform a log-off and a subsequent log-in for re-starting the system. This is an advantage since modifications and updates made to the system can be quickly displayed to the user without logging off and back on again. The prior art of record fails to teach or suggest this operational

relationship. Basis for this amendment may be found at page 15, lines 11-12; and at page 16, lines 5-7 of applicant's specification.

Applicant respectfully notes that, if anything, Stack teaches away from the present invention being that Stack requires his automated program synthesizer to generate a program code 24 and program documentation 26 based on a specific computer programming language. Thus, it is felt that Stack requires the involvement of personnel that must have knowledge of a computer programming language to make meaningful use of such a code and associated documentation. See Stack at col. 5, lines 16-31, col. 7, lines 55-67, and col. 8, lines 19-23.

In view of the foregoing amendment and remarks, it is respectfully submitted that Stack does not render unpatentable claim 1 under the statutory standards of § 103. It is also respectfully submitted that, as amended, claim 1 is no longer subject to any lack of enablement issues. Since each of the dependent claims from independent claim 1 includes the structural and/or operational relationships respectively recited in such independent claim, it is also respectfully submitted that Stack also fails to obviate each of such dependent claims.

Claim 15 is directed to a computerized applications generator system for developing an electronics records management system without requiring knowledge regarding a computer programming language. The system is customizable to meet ongoing information needs of users of a given enterprise application. Claim 15, as amended, sets forth that a processor is configured to process the control tables to construct a respective record set object array corresponding to the rules provided by a user having business subject matter expertise in the enterprise application in order to build a customized records management system. This is performed without having to create a program code based on a computer programming language. This is very different and inapposite to Stack that requires his program synthesizer to generate program code in a specific computer program language. Accordingly, it is respectfully submitted that Stack also does not render unpatentable claim 15. Since each of the dependent claims from independent claim 15 includes the structural and/or operational relationships respectively recited in such independent claim, it is also

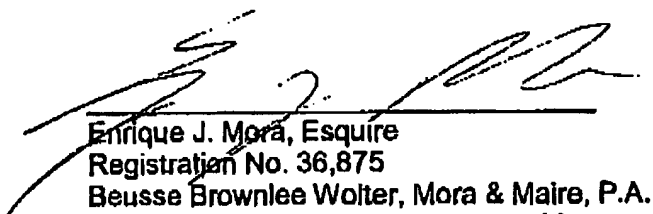
respectfully submitted that Stack also fails to obviate each of such dependent claims.

It is respectfully submitted that each of the claims pending in this application recites patentable subject matter and it is further submitted that such claims comply with all statutory requirements and thus each of such claims should be allowed.

The applicant appreciates the Examiner's efforts for conducting a thorough examination, and cordially invites the Examiner to call the undersigned attorney if there are any outstanding items that may be resolved via telephone conference.

DATED this 13<sup>th</sup> day of July, 2004.

Respectfully submitted,



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